Part C State Annual Performance Report (APR) for FFY 2011

Overview of the Annual F	Performance Rep	port Development:
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Same description as in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8A: Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:

A IFSPs with transition steps and services

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement:

A. Percent = [(# of children exiting Part C who have an IFSP with transition steps and services) divided by the (# of children exiting Part C)] times 100.

FFY	Measurable and Rigorous Target
FFY 2010	100%

Actual	Target	Data f	or FI	FY 2	201	1:
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89%	

Method used to collect data and the procedures used to collect these data:

Transition data were gathered through a self-report process from eleven Early Intervention Programs (EIPs) from a review of all child files within a period of time designated by AzEIP. Eight EIPs reported data for children with an IFSP between April 1, 2011 and June 30, 2011. Three EIPs reported data for children with IFSPs between January 1, 2012 to March 30, 2012, which coincided with an on-site review process.



Children Exiting Part C who Received Timely Transition Planning:

a.	Number of children exiting Part C who have an IFSP with transition steps and services	199
b.	Number of children exiting Part C	224
the	rcent of all children exiting Part C who received timely transition planning to support child's transition to preschool and other appropriate community services by their d birthday (Percent = [(a) divided by (b)] times 100)	89%

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred in FFY 2011:

The state did not meet its target of 100 percent for FFY 2011 and experienced slippage from FFY 2010 data at 96 percent. Analysis of data by the AzEIP Service providing agency and then by their local early intervention programs (EIP) identified:

AzEIP Service Providing Agency	Total IFSPs with Transition Steps and Services	Total IFSPs Reviewed	% IFSPs Compliant
Arizona State Schools for the Deaf and the Blind	4	4	100%
(1 EIPs)			
DES/Division of Developmental Disabilities	143	164	87%
(5 EIPs)			
DES/AzEIP Team-Based Early Intervention Services	52	56	93%
(8 EIPs)			
Total	199	224	89%

- One of the three AzEIP service providing agencies, ASDB, demonstrated understanding and adherence (achieved 100 percent) to the requirements of ensuring appropriate steps and services to support the transition to preschool and other appropriate community services are documented on the child's IFSP.
- DDD, another AzEIP service providing agency, which included five of their EIPs was at 87 percent (143/164). One of the EIPs was at 99 percent, demonstrating substantial compliance but none of the EIPs met compliance at 100 percent. The remaining four DDD EIPs compliance ranged from 83 percent (44/53) to 40 percent (4/10).



- The DES/AzEIP TBEIS programs were at 93 percent (52/56). Four of the eight DES/AzEIP TBEIS programs were at 100 percent compliance, and the remaining three were at 89 (8/9) percent, 88 (7/8) percent and 80 (8/10) percent compliance, respectively.
- EIPs with verified self-report data less than 85 percent were required to conduct a root cause analysis using the Local Contributing Factor Tool to identify the root causes of the non-compliance, and to use the information to develop meaningful strategies to correct the noncompliance, For programs with data less than 76 percent, the state review team facilitated the root cause analysis process with EIPs selected for site-reviews. Overall analysis of the root causes of the noncompliance, identified in the EIPs that completed the Contributing Factor Tool, indicated that the service coordinators were unaware of the requirement not only to document the transition steps and services on the child's IFSP but that they needed to document the completion of the activities.
 - Through interviews with service coordinators and parents, it was evident that the service coordinators were implementing the actual transition steps and services and the corresponding documentation was in the child's record, such as contact notes, copies of the PEA Notification/Referral, and completed copies of the Transition Conference Summary form. However, the service coordinators were not then documenting the completion date of the steps on the IFSP Transition Plan and Timeline page. As a result, when file reviews/ data verification was being completed, DES/AzEIP was unable to verify compliance.
- In an effort to provide early intervention providers with a quick reference of the transition requirements, AzEIP developed the AzEIP Transition Activities Table. This technical assistance document was disseminated through email to all early intervention providers and then posted on the AzEIP website. In addition, service coordinators had access to a Child Find and Transition, In by 3, voice over power point that was also available on the state's website.
- The AzEIP TAMS provided targeted technical assistance to the EIPS through the development of corrective actions, regular status check to monitor the EIPs progress on their corrective action plan and provided on-site training, as needed.

See combined Improvement Activity table for a description of the remaining Improvement Activities.

Correction of FFY 2010 Findings of Noncompliance (if State reported less than 100 percent compliance):

Level of compliance (actual target data) State reported for FFY 2010 for this indicator: 96 percent

1	١.	Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010 through June 30, 2011)	3
2	2.	Number of FFY 2010 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	2
3	3.	Number of FFY 2010 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	1

Correction of FFY 2010 Findings of Noncompliance Corrected Beyond One Year (if State reported less than 100 percent compliance):

Level of compliance (actual target data) State reported for FFY 2010 for this indicator: 96 percent

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4.	Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010 through June 30, 2011) not Corrected within One Year	1
5.	Number of FFY 2010 findings the State verified as corrected (beyond one year from the date of notification to the EIS program of the finding)	1
6.	Number of FFY 2010 findings <u>not</u> verified as corrected <u>beyond</u> one year [(1) minus (2)]	0

Demonstrating Correction as outlined in 09-02 Memo

- 1. Accounting for All Instances of Noncompliance in FFY 2004:
 - The state accounted for all instances of noncompliance as identified through the three year selfreport cycle.
- 2. Noncompliance from FFY 2010 Occurred in 3 EIPs as Follows:
 - 97percent (35/36)
 - 88percent (64/73)
 - 80% (4/5)
 - A root cause analysis of this EIP's data conducted by the state and local team during a site review determined that the contributing factor to the noncompliance was due to service coordinators not following AzEIP policies and procedures for documenting completion of the transition steps and services on the IFSP.
- 3. To Address the Noncompliance, the State Required the EIP to:
 - Develop meaningful strategies to correct the noncompliance using the Local Contributing Factor Tool
 - Ensure their service coordinators listened to the Child Find and Transition, In by 3 PowerPoint and reviewed the AZEIP Transition Activities Table, both of which were available on the AzEIP website.
 - Review subsequent child records to verify if the identified strategies to correct the noncompliance
 were effective, meaning the EIP was making progress or met compliance in documenting the
 transition steps and services on the child's IFSP. If the EIP was not making progress, the EIP
 was required to review and revise the strategies, if necessary.
- 4. Specific actions that were taken to verify the correction of FFY 2010 Findings of Noncompliance (either timely or subsequent):
 - Prong 1: To ensure correction of child-specific noncompliance, the state verified that the EIPs
 have developed an IFSP with transition steps and services for each child, unless the child is no
 longer within the jurisdiction of the EIS program (i.e., the child has exited the state's Part C
 program due to age or other reasons), consistent with OSEP Memo 09-02.
 - Prong 2: To ensure the EIP was (1) correctly implementing 34 CFR §§ 303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) and (d)(8) (i.e., achieved 100 percent compliance) the state required the EIP to either a) submit updated data for the state to review and verify or b) the state

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conducted on-site reviews to verify that the EIP was correctly implementing the requirements. In either instance, the state verified the program was implementing the requirements at 100 percent.

Statement from OSEP Response Table	State's Response
OSEP appreciates the state's efforts and looks forward to reviewing in the FFY 2011 APR the state's data demonstrating that it is in compliance with the IFSP transition content requirements in 34 CFR §§ 303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) and (d)(8). Because the state reported less than 100 percent compliance for FFY 2010, the state must report on the status of correction of noncompliance reflected in the data the state reported for this indicator.	The state did not demonstrate that it is in compliance with the IFSP transition content requirements in 34 CFR §§ 303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) and (d)(8). The state reported on the status of correction of noncompliance for FFY 2010.
When reporting on the correction of noncompliance, the state must report, in its FFY 2011 APR, that it has verified that each EIS program with noncompliance identified in FFY 2010 for this indicator: (1) is correctly implementing 34 CFR §§ 303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) and (d)(8) (i.e., achieved 100 percent compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a state data system; and (2) has developed an IFSP with transition steps and services for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the state's Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2011 APR, the state must describe the specific actions that were taken to verify the correction.	The state included a description of correction consistent with OSEP Memo 09-02, including the specific actions the state took to verify the correction.
If the state does not report 100 percent compliance in the FFY 2011 APR, the state must review its improvement activities and revise them, if necessary to ensure compliance.	The state reviewed its improvement activities and determined not to revise them.

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011 (if applicable):

N/A None at this time